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Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

In re  
DAVID R. MICHAL,  
Debtor,

and

REAVEN, INC., LEGACY PARTNERS 314,  
LLC, DRC PROPERTIES, LLC,  
STEWARDSHIP PARTNERS GROUP, LLC,  
EVERLASTING INVESTMENTS, LLC, and  
ELIAS MICHAL VENTURES, LLC,

Substantively Consolidated  
Debtors.

Case No. 22-22056  
Chapter 7

DCN: KMT-15

**DECLARATION OF ROSS ABBASI IN  
SUPPORT OF APPLICATION FOR  
COMPENSATION OF BROKER  
CITIZENS CHOICE REALTY**

Judge: Hon. Christopher M. Klein  
Date: December 3, 2024  
Time: 10:00 a.m.  
Dept.: C, Courtroom 35

I, Ross Abbasi, declare as follows:

1. I am an agent for Citizens Choice Realty ("Broker"), the broker for Kimberly J. Husted ("Trustee"), the trustee for the bankruptcy estate of David R. Michal ("Debtor"). I am familiar with the business operations of the Broker and also the books and records of the Broker as it relates to this matter. Unless stated otherwise, this declaration is based upon my own personal knowledge and if called as a witness, I could and would competently testify to the facts set forth herein. I make this declaration in support of the application for compensation of the Broker.

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1           2.       I understand that on or about May 22, 2024, the Court entered an order granting  
2 KMT-10, the Trustee's application to employ the Broker to market the estate's interest in certain real  
3 property commonly known as 1207 East Street, Redding, California ("Subject Property"). The  
4 listing agreement and addendum provided, among other things, that the list price for the Subject  
5 Property would be \$2,500,000 and the Broker's commission (which may be shared with a buyer's  
6 broker) would be 5% of the sale price.

7           3.       Prior to the application and order, the Trustee requested that I perform services on  
8 the bankruptcy estate's behalf. The Trustee asked me to travel to various properties to investigate  
9 the properties and evaluate the potential value of the real properties compared to liens. I began  
10 performing these services in about August and September 2023.

11          4.       When the original services were rendered, I was aware that there were potential  
12 issues that needed to be resolved in order to sell any of the real properties. However, if those issues  
13 were resolved, the Trustee would hire me to sell some (or all) of the real properties in which I would  
14 be compensated on a commission fee basis. A commission fee is the normal and customary manner  
15 in which real estate brokers are compensated and how I understood I would be compensated.

16          5.       After I was employed by the Trustee through court order, I was under the impression  
17 that I would be able to attempt to market and sell the Subject Property. I began performing  
18 additional services to assist the Trustee, which I kept track of. However, unbeknownst to me, the  
19 sale of the Subject Property would be unnecessary as I understand that the Trustee entered into a  
20 settlement agreement with the Debtor that would be significantly beneficial to the bankruptcy estate.

21          6.       I am happy that the Trustee was able to resolve the issues with the Debtor, which did  
22 not require the liquidation of any real property. The Trustee has asked that I still seek compensation  
23 for the time I incurred in the case as I understand my services significantly assisted the Trustee. In  
24 total, I spent 41.9 hours on this matter for a total of \$12,570.00, of which 8.9 hours for a total fee of  
25 \$2,670.00 were incurred prior to effective date of the order of employment. A true and correct copy  
26 of a spreadsheet I prepared identifying the services rendered and the charges incurred are filed  
27 herewith as **Exhibit B**.

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